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**Subject:** Fw: Lower Gallatin Follow-Up: Comment Summary  
**Date:** 10/29/2012 09:39 AM  
**Attachments:** [Appendix H Response to Public Comments EPA Edits.docx](#)

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Hi Christian,

Here's the public comment responses with EPA edits. Don't worry about Thursday's meeting - we could tell you were frustrated but overall you acted professionally. We totally understand your frustration in getting repeatedly hammered from the city and consultants on this project and being put in the position of defending a sampling plan you had no part in designing. While we do have litigation and other concerns with the document, we think you did a commendable job with what you had to work with. We apologize for providing you so many comments so late in the review process. As Jason mentioned, let us know if you'd like to discuss any of the comments or go over any examples with us to help us better understand things.

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----- Forwarded by Lisa Kusnierz/MO/R8/USEPA/US on 10/29/2012 08:58 AM -----

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**Subject:** Lower Gallatin Follow-Up: Comment Summary

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Dean/Christian -

Some more info for our Lower Gallatin discussion today. I know there are a ton of comments in the report - don't get overwhelmed - we are just trying to help make this an A+ document. We gave this report an extra thorough review because of the politics in the watershed, as well as the politics of nutrient criteria/TMDLs. I've provided an overall summary of the MAJOR comments below, including issues that impact our ability to approve the document. I hope this helps. Also, we've reviewed your "response to comments", and have some suggestions for that portion of the document (attached).

Jason

### **General Comments:**

(1) The calculation of the existing nutrient loads (i.e., individual source loadings) is not clear (Section 6.6.1 and Appendix F). This is an approvability issue - the

existing source loads must be clearly explained. The concept is sound, I just can't follow exactly what was done, and how the loads in Appendix F relate to the loads in Section 6.6.1.

(2) We have concerns about the available nutrient data for each stream. In many cases, there are not sufficient data to implement the nutrient assessment methodology. Also, the assessment methodology used in the document is unclear, and appears to deviate from the formal method. At the very least, the employed method needs to be better explained.

(3) The chosen method for calculating existing loads (i.e., synoptic data collected during one sampling event) is a very simple approach and does not fit the complex nature of the watershed.

(4) Section 6 and Appendix F are, in general, difficult to read and unclear.

(5) The science behind the nutrient source assessment needs more explanation. The discussions of the stormwater load, septic loads, etc. are difficult to understand. In some cases (like with the MS4 model), there is little to no explanation regarding how the loads were developed. These need to be clarified.

(6) The waterbody segmentation in the nutrient section of the document is difficult to follow. This is due to the influence of the high phosphorus Level IV ecoregion. The document format needs to be more clear regarding segmentation, and EPA also suggests adding maps to make the situation more clear.

(7) The source categories are inconsistent between Appendix F and Section 6.6.1 (i.e., category names change between the sections).

(8) The approach for allocating to sources (i.e., an "equal allocation" approach) is not well described, and it does not always make sense. More thought is needed regarding how to allocate to the various sources.

(9) The discussion of nutrient background loading is difficult to follow and needs to be better explained.



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